

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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April Bezdichek,

Court File No. 08-6196 (JNE/JJG)

Plaintiff,

v.

**DECLARATION OF HEATHER  
HUGGHINS.**

Hilton Hotels Corporation d/b/a  
HHC-Hilton Minneapolis H&T, and  
James M. Vennewitz,

Defendants.

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I, HEATHER HUGGHINS, state as follows:

1. I am the In-Room Dining Manager at the Minneapolis Hilton located at 1001 Marquette Avenue in Minneapolis.
2. On August 30, 2007, I attended a party in Boardroom 1 following the Director of Sales conference.
3. Many of local Hilton hotel's managers were present at the party.
4. The party was to celebrate the completion of the conference.
5. I arrived at the party about 30-45 minutes after the toast. I arrived with Gretchen Jorgenson.
6. Many of the managers consumed alcohol at the evening. Some consumed to excess, and the party should have ended earlier than it did.

7. I did not see any sexual activity at the party. All participants were clothed and, besides some foul language here and there, no inappropriate sexual conduct took place.

8. I remember Deborah Smith walking into the Boardroom upset. Smith raised her voice and asked about closing the bar. Smith then stormed out of the Boardroom.

The undersigned declares under penalty of perjury under the laws of the United States and the State of Minnesota that the foregoing facts stated in this Declaration are, to the best of her knowledge and belief, true and correct.

Executed on this 15th day of December 2008.

  
Heather Huggins